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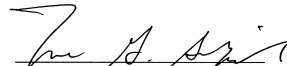
June 28, 2023

**VIA ECF**

Hon. Lorna G. Schofield  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Application **denied without prejudice to renewal**. By **June 30, 2023**, Plaintiff shall refile, along with its motion to seal, the unredacted (under seal) and redacted versions of the document for the Court's review. Plaintiff shall include in its motion the basis for its request. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006). The document filed at Dkt. No. 42 shall remain under seal in the meantime.

Dated: June 29, 2023  
New York, New York

  
LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

Re: ***Vinci Brands, LLC v. Coach Services, Inc.***, Case No. 1:23-CV-05138

Dear Judge Schofield,

I write on behalf of the Plaintiff, Vinci Brands, LLC in the above-captioned matter. I write to respectfully request sealing of ECF No. 42, a declaration from Vinci Brands LLC member, Steve Latkovic, filed on June 27, 2023. This Court previously granted Vinci's motion to file certain exhibits to its Amended Complaint and its Application for Preliminary Injunction and Temporary Restraining Order under seal. Counsel for Defendants Coach Services, Inc, Kate Spade LLC, and Tapestry, Inc. have advised us that ECF No. 42 contains confidential information and requested that we refile it under seal.

On June 28, 2023, we alerted the Help desk and they have informed us that ECF No. 42 has been placed under emergency seal. Pursuant to ECF Rules & Instructions Rule 21.7(b), we respectfully request that the declaration, ECF No. 42, be formally sealed. Please see the appendix attached to this letter for a list of all parties and attorneys of record who should have access to the sealed version of ECF No. 42. In accordance with Rule 21.7, we will re-file a redacted version of the Latkovic declaration/ECF No. 42 on the ECF.

Very truly yours,

BENESCH, FRIEDLANDER,  
COPLAN & ARONOFF LLP

/s/ Michael A. Vatis

Michael A. Vatis

MAV:



Hon. Lorna G. Schofield

June 28, 2023

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## **APPENDIX**

Those who should have access to the sealed version of ECF No. 42, declaration of Steve Latkovic:

Michael Vatis and Paul Del Aguila for Plaintiff Vinci Brands LLC

Erika Birg, Alan Kaufman, and Nicole Phe for Defendant Case-Mate, Inc.

Christine B. Cesare, Nick Williamson, Jane Ernst, and Thomas Schell, for Defendants Kate Spade, LLC, Coach Services, Inc., and Tapestry, Inc.